



## **Charter School Authorizer Evaluations Non-Evaluation Year Self-Assessment 2021**

**Authorizer:** Tennessee Public Charter School Commission

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**About this Document:** As required by the Tennessee State Board of Education (State Board) Rule 0520-14-01-.08, in a non-evaluation year, authorizers will complete and submit the following to the State Board along with of the annual authorizing report:

- A non-evaluation year self-assessment using the template provided by the State Board; and
- A completed corrective action plan, if applicable, that includes any supporting documentation to demonstrate resolution of identified deficiencies.

This form affords the authorizer an opportunity to rate and explain its authorizing processes during a non-evaluation year. Authorizers are not required to submit additional documentation beyond this self-assessment form, unless required by a corrective action plan. This completed self-assessment form and corrective action plans, if applicable, must be submitted to the State Board along with the annual authorizing report via email to Ali Gaffey, Director of Engagement and Accountability, at [ali.gaffey@tn.gov](mailto:ali.gaffey@tn.gov) by **January 1, 2022**.

**Directions:** Complete the self-assessment form by reviewing each standard and sub-standard on the pages that follow and selecting a rating for each using the guidance below. Provide a brief explanation for each to describe the evidence used to determine a rating.

*When rating processes:*

- Include a rating of 0-4 for each substandard.
- Refer to the ratings key included below when determining substandard ratings.
- Calculate the Standard Rating as the average of the substandard ratings.

*When explaining processes:*

- Include explanations (limit 500 words).
- Identify how it supports the rating you selected.
- **BOLD** the names of documents referenced in explanation and identify the specific applicable page numbers or page ranges.
- If a corrective action plan was in place, explain how the documentation provided addresses the deficiencies cited in the plan.

#### Ratings Key

0	1	2	3	4
No explanation or documentation	Narrative and/or documentation addresses and satisfies less than 50% of the standard	Documentation addresses most but satisfies less than 50% of the standard	Documentation addresses and satisfies more than 50% of the standard	Documentation addresses and satisfies 100% of the standard

<b>Standard 1a - Planning and Commitment to Excellence</b>					
<b>Sub-standards</b>					
	<b>0</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>
i. Supports and advances the purposes of charter school law.					4
ii. Ensures that the authorizer's local board of education or authorizing board, leadership, and staff understand and are committed to the quality charter authorizing principles and standards and developing as authorizing professionals.					4
iii. Defines external relationships and lines of authority to protect its authorizing functions from conflicts of interest and political influence.				3	
iv. Implements policies, processes, and practices that streamline and systematize its work toward stated goals, and executes its duties efficiently while minimizing administrative burdens on schools.					4
v. Evaluates its work regularly against national and state standards for quality authorizing and recognized effective practices, and develops and implements timely plans for improvement when necessary.				3	
vi. States a clear mission for quality authorizing.					4
vii. Makes authorizing decisions that will result in positive student outcomes, in accordance with state law.					4
<b>Standard Rating</b>					<b>3.7</b>
<b>Explanation (limited to 500 words):</b>					
<p>i. Support and advancement of charter school law is a priority of the Commission. This is evidenced by the application and appeal process, which utilizes the TDOE application and rubric, which requires schools demonstrate learning for all students and closes the achievement gap, options for parents to meet the educational needs of students, and encourages innovative teaching methods. Support of charter school law is further evidenced in the 2021 new start appeal cycle/process, when the Commission heard Nashville Classical II and Academy of the Arts. Based on a review of the merits of the applications, the Commission voted to approve one application and deny the other application. Further, as soon as a sponsor is denied by a district, it is standard practice for the Commission to communicate with applicant, share written guidance information about the appeal process and schedule a time to discuss process over the phone. The Commission also has a performance framework which measures performance of pupils and faculty to ensure that schools are moving toward proficiency on state academic assessments. Professional development opportunities are communicated to Commission authorized schools through a regular newsletter.</p> <p><b>Documents:</b> TDOE application and rubric, recommendation and Executive Director's report for Nashville Classical II and Academy of the Arts, Emails/Meeting invites with schools going through appeal process, performance framework, newsletter</p>					

- ii. The Commission demonstrates that their Commission members, leadership, and staff receive training as evidenced through Commission member training held in July 2021 related to new start appeals and best practices, attendance at the NACSA conference by all staff, and by quarterly and bi-monthly staff-wide meetings.

**Documents:** Sign in sheets, evidence of training by entire Commission through Commission meeting minutes, leadership, and authorizing staff that includes at least once within review term.

- iii. Commission Policy 1.100 addresses conflict of interests and requires annual submission by Commission members. The definition of relationships and influence is further defined within the actual conflict of interest disclosure statement. Review committee members are also required to document and sign conflict of interest statements before reviewing any appeal charter application. The Commission will begin requiring annual submission of conflict-of-interest statements by its staff members.

**Documents:** Commission Policy 1.10, Conflict of interest statements for Commissioners, Conflict of interest statements for reviewers

- iv. Commission Policy 3.000 articulates the Commission's Core Authorizing Principles, maintaining high standards, upholding school autonomy, and protecting students and public interests. Further, Commission Policy 3.200 addresses charter school autonomy, including a general description, areas of autonomy, enhancing autonomy and minimizing burden, and conflicts of interest. Implementation of these policies is demonstrated through an annual policy review and audits in April 2021. Further, the authorizer conducts a self-assessment annually to ensure that practices support the policies and minimize the administrative burden on schools. Lastly, a reporting calendar is provided to schools annually, which clearly documents the deadlines and submission requirements.

**Documents:** Commission Policy 3.000 and 3.2000, documentation of policy review and audit, Self-Assessment, reporting calendar

- v. The Commission regularly evaluates its work against national and state standards by completing an annual self-assessment process and contracting with nationally recognized charter school educational consulting firms to evaluate its processes, including the performance framework. Authorizing practices are also evaluated through regular staff development opportunities such as the national NACSA conference, TDOE monthly webinars, State Board of Education authorizing webinars, and ongoing collaboration with other authorizers nationally and state-wide. Moving forward, the Commission will also formalize and codify the feedback process to allow school feedback to inform the self-evaluation process.

**Documents:** Self-Evaluation, Performance Framework, Professional development log, meetings with other authorizers

- vi. Policy 1.000 articulates the Charter Commission and states, "The mission of the Charter Commission is to provide positive academic and life outcomes for Tennessee's students through access to high-quality public charter schools. The effectiveness of these schools will be ensured through approval and support using rigorous oversight, transparency, and accountability." The mission is further supported by the Commission's Strategic Plan, which serves as a roadmap and guide for the Commission's work and supports the mission.

**Documents:** Commission Policy 1.000 and Strategic Plan

- vii. During FY22, the Commission received two new start appeals in which they were responsible to determine whether there is a strong likelihood for student success and in accordance with state law. The Commission follows a rigorous review process on all new start, revocation, or renewal appeals, which includes compiling a review committee, holding a capacity interview, and completing a public hearing to ensure decisions are made in the best interest of students.

**Documents:** TDOE New Start Application and Rubric, documentation of capacity interview, public hearing, review committee report to demonstrate expertise

Standard 1b - Human Resources		0	1	2	3	4
Sub-standards						
i.	Through intra- or inter-agency collaborations, contractual relationships and/or staff, enlists expertise and competent leadership for all areas essential to charter school oversight—including, but not limited to, education leadership; instruction; assessment; local community needs; special education, English learners, and other diverse learning needs; performance management and accountability; law; finance; facilities; and nonprofit governance and management.					4
ii.	Employs competent personnel at a staffing level appropriate and sufficient to carry out all authorizing responsibilities in accordance with national and state standards, and commensurate with the scale of the charter school portfolio.					4
iii.	Demonstrates an on-going commitment to developing and retaining authorizing staff members and provides regular professional development for the agency’s leadership and local board of education or authorizing board to achieve and maintain high standards of professional authorizing practice and to enable continual agency improvement.					4
Standard Rating						4.0
Explanation (limited to 500 words):						
i.	The organization chart and resume of each personnel fully or partially funded by the authorizer fee demonstrates that the Commission enlists expertise for all areas essential to charter school oversight. The Commission also conducts a rigorous process when compiling review committee members to ensure that these contractual relationships represent expertise in education, instruction, local community needs, special education, special populations, law, finance, facilities, and any other area of expertise deemed necessary. For example, the Commission ensured that the review committee for the Achievement School District applications included representatives and locals from Memphis, TN and has contracted with SchoolWorks to review and revise the Commission’s Performance Framework.					
Documents: Organization chart, resumes, review committee application, sample application of external reviewer, contract with SchoolWorks, Annual Authorizer Fee Report (future years)						
ii.	The Commission employs competent personnel at all levels of staffing to ensure that all authorizing responsibilities are conducted in accordance with national and state standards and commensurate with the scale of the charter school portfolio. This is articulated in Commission staff resumes, job descriptions, and attendance to state and national conferences.					
Documents: Organization chart, resumes, job descriptions, records of attendance at NACSA and state workshops covered in reporting cycle						

- iii. An on-going commitment to developing and retaining authorizing staff members is articulated in the Commission staff professional development learning logs which include attendance at NACSA conferences, TDOE webinars, State Board of Education authorizing webinars and other relevant workshops. The Commissioners were also trained in appeals and best practices in July 2021. Commission leadership is committed to provide additional training when necessary to continually improve and maintain high standards of authorizing.

**Documents:** Sign in sheets, evidence of training by entire Commission, leadership, and authorizing staff that includes at least once within review term

Standard 1c – Financial Resources		0	1	2	3	4
Sub-standards						
i.	Determines the financial needs of the authorizing office and devotes financial resources to fulfill its authorizing responsibilities in accordance with national and state standards, commensurate with the scale of the charter school portfolio, and in accordance with Tennessee statute, including all relevant requirements for use of the authorizer fee.					4
ii.	Structures its funding in a manner that avoids conflicts of interest, inducements, incentives, or disincentives that might compromise its judgment in charter approval and accountability decision making.				3	
iii.	Deploys funds effectively, transparently, and efficiently with the public and student interests in mind.					4
iv.	Annually reports the authorizing obligations fulfilled using the authorizer fee in accordance with state law.	N/A				
Standard Rating						3.7
Explanation (limited to 500 words):						
i.	The operating budget for the Commission and future annual authorizer reports demonstrate the financial resources that are utilized to fulfill authorizing responsibilities and adequately staff with the appropriate number of full-time employees. The budget clearly delineates the different revenue streams utilized by the Commission to support its work, and the budget itemizes expenses related to the work of authorization.					
Documents: Annual operating budget (including all revenue and expenses), annual authorizing report (in the future), organization chart, resumes, job descriptions						
ii.	Commission Policy 1.100 addresses conflict of interests and requires annual submission by Commission members. The definition of relationships and influence is further defined within the actual conflict of interest disclosure statement. Review Committee members are also required to document and sign conflict of interest statements before reviewing any appeal charter applications and the Commission will begin requiring annual submission of conflict-of-interest statements by its staff members.					
Documents: Commission Policy 1.10, conflict of interest statements for Commissioners, conflict of interest statements for reviewers						
iii.	The operating budget and future annual authorizer reports document how annual authorizer fees are used with public and student interests in mind. The authorizing fees are utilized to cover the cost of staff responsible for the authorizing responsibilities, including the approval process, interim process,					



renewal process, regular monitoring and oversight activities, and ongoing charter school support. The annual authorizer fee report will be published via the Commissions website and will include a narrative of how fees are spent.

**Documents:** Annual operating budget (including all revenue and expenses), budget narrative, annual authorizing report (in the future), organization chart, resumes, job descriptions

- iv. The Commission will annually demonstrate how it utilizes the authorizing fee in accordance with state law to fulfill its authorizing obligations specifically as it relates to the application, amendment, renewal and appeal process, monitoring and oversight activities, and ongoing charter school support services through its Annual Authorizer Report.

**Documents:** Annual authorizing report (in the future), organization chart, resumes, job descriptions

<b>Standard 2a – Proposal Information, Questions, and Guidance</b>		<b>0</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>
<b>Sub-standards</b>						
i.	Issues a charter application information packet or request for proposals (RFP) that: a) States any chartering priorities the authorizer may have established; b) Articulates comprehensive application questions to elicit the information needed for rigorous evaluation of applicants' plans and capacities; and c) Provides clear guidance and requirements regarding application content and format, while explaining evaluation criteria.	N/A				
ii.	Welcomes proposals from first-time charter applicants as well as existing school operators/replicators, while appropriately distinguishing between the two kinds of applicants in proposal requirements and evaluation criteria.					
iii.	Encourages expansion of charter schools that demonstrate academic success, financial viability, organizational health, and capacity for growth.					
iv.	Encourages replication of charter schools that demonstrate academic success, financial viability, organizational health, and capacity for growth.					
v.	Considers diverse educational philosophies and approaches.					
vi.	Requires applicants to demonstrate capacity to serve students with diverse needs, such as students with disabilities or learning exceptionalities and English learners.					
<b>Standard Rating</b>						<b>N/A</b>
<b>Explanation (limited to 500 words):</b>						
Pursuant to Tennessee Code Annotated (T.C.A.) § 49-13-108, public charter school sponsors may appeal the denial of an application by a local board of education to the Tennessee Public Charter School Commission. As a result, Standard 2a does not apply as these sub-standards are focused on the application process including soliciting applications, following the application timeline, etc., which does not apply to the Charter Commission's work as an appellate body.						

Standard 2b – Fair, Transparent, Quality-focused Procedures.		0	1	2	3	4
Sub-standards						
i.	Implements a charter application process that is open, well-publicized, and transparent, and is organized around clear, realistic timelines.	N/A				
ii.	Allows sufficient time for each stage of the application and school pre-opening process to be carried out with quality and integrity.					
iii.	Explains how each stage of the application process is conducted and evaluated.					
iv.	Communicates the education needs of the district, the charter authorizing processes, approval criteria, and decisions clearly to the public.					
v.	Informs applicants of their rights and responsibilities and promptly notifies applicants of approval or denial, while explaining the factors that determined the decision so that applicants can decide if they wish to revise their plans based in part on that information and resubmit in the future.					
Standard Rating					N/A	
Explanation (limited to 500 words):						
Pursuant to Tennessee Code Annotated (T.C.A.) § 49-13-108, public charter school sponsors may appeal the denial of an application by a local board of education to the Tennessee Public Charter School Commission. As a result, Standard 2b does not apply as these sub-standards are focused on the application process including soliciting applications, following the application timeline, etc., which does not apply to the Charter Commission’s work as an appellate body.						

<b>Standard 2c - Rigorous Approval Criteria.</b>					
<b>Sub-standards</b>					
	<b>0</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>
i. Requires all applicants to present a clear and compelling mission, a quality educational program, a demonstration of community support, a solvent and sustainable budget and contingency financial plans, a clear demonstration of the effectiveness of the model for the target student population, effective governance and management structures and systems, founding team members demonstrating diverse and necessary capabilities in all phases of the school's development, and clear evidence of the applicant's capacity to execute its plan successfully.					4
ii. Establishes distinct requirements and criteria for applicants who are existing school operators or replicators.					4
iii. Establishes distinct requirements and criteria for applicants proposing to contract with educational service providers (ESPs), including charter management organizations.					4
<b>Standard Rating</b>					<b>4.0</b>
<b>Explanation (limited to 500 words):</b>					
<p>i. All applicants are required to utilize the TDOE new start application, and the Commission uses the TDOE rubric to evaluate these applications. Utilizing this template ensures that all applicants present a clear and compelling mission, quality education program, demonstrate community support and a solvent and sustainable budget, in addition to other indicators signaling capacity to execute its plan successfully. The Commission also assembles an independent review committee comprised of individuals with varying areas of expertise and knowledge in order to adequately evaluate the application as well as assess the capacity of the sponsor during the capacity interview. All review committee members are required to attend a training meeting to ensure normed assessments are completed, and that the review process reflects high-quality authorizing standards.</p> <p><b>Documents:</b> TDOE application and rubric, review committee training materials, Nashville Classical II, Academy of the Arts, and Rutherford Collegiate Prep process includes norming of review committee rubrics, capacity interview notes, and review committee report</p> <p>ii. The TDOE new start application requires additional questions and criteria for existing school operators and replicators beyond questions that are included for new start applicants without other locations. The Commission uses the TDOE rubric to evaluate these applications.</p> <p><b>Documents:</b> TDOE application and rubric</p>					

- iii. The TDOE new start application requires additional questions and criteria for applicants proposing to contract with educational service providers, including charter management organizations beyond the set of questions that are included for all applicants. The Commission uses the TDOE rubric to evaluate these applications.

**Documents:** TDOE application and rubric

Standard 2d - Rigorous Decision Making.		0	1	2	3	4
Sub-standards						
i.	Grants charters only to applicants that have demonstrated competence and capacity to succeed in all aspects of their particular charter school model, consistent with the stated approval criteria.					4
ii.	Rigorously evaluates each application through thorough review of the written proposal, a substantive in-person interview with each qualified applicant, and all appropriate due diligence to examine the applicant’s experience and capacity, conducted by knowledgeable and competent evaluators.					4
iii.	Engages, for both written application reviews and applicant interviews, highly competent teams of internal and external evaluators with relevant educational, organizational (governance and management), financial, and legal expertise, as well as thorough understanding of the essential principles of charter school autonomy and accountability.					4
iv.	Provides orientation or training to application evaluators (including interviewers) to ensure consistent evaluation standards and practices, the elimination of real or perceived conflicts of interest, the observance of essential protocols, and the fair, unbiased treatment of all applicants.					4
v.	Ensures that the application-review process and decision making are free of conflicts of interest, and requires full disclosure of any potential or perceived conflicts of interest between reviewers or decision makers and applicants.					4
vi.	Approves applications that are comprised of a detailed plan for charter school opening, operation, and fiscal stability, with little substantive work left for later development.					4
Standard Rating						4.0
Explanation (limited to 500 words):						
i.	The Commission conducts a rigorous de novo review of all new start appeal applications to ensure charters are only granted to applicants that have demonstrated competence and capacity to succeed in all aspects of their model. All reviews are conducted consistently by utilizing the TDOE application and rubric, an independent review committee, capacity interview, and public hearing. The information gathered through these exercises are utilized in the preparation of the executive director’s final recommendation and resolutions. This is consistent with Rule: 1185-01-01 Charter School Appeals and TPCSC policy 2.000, which addresses Charter School Appeals.					

**Documents:** TDOE application and rubric, review committee report with bios, public hearing notes, capacity interview notes, executive director's report and resolutions, rule 1185-01-01 and TPCSC policy 2.000, and Nashville Classical II, Academy for the Arts, and Rutherford Collegiate Prep review file to demonstrate that these standards and procedures were followed

- ii. Rigorous evaluations of all new start appeal applications are conducted to ensure charters are only granted to applicants that have demonstrated competence and capacity to succeed in all aspects of their model. All reviews are conducted consistently by utilizing the TDOE application and rubric, an independent review committee, capacity interview, and public hearing. The information gathered through these exercises are utilized in the preparation of the executive director's recommendation and resolutions. This is consistent with Rule: 1185-01-01 Charter School Appeals and TPCSC policy 2.000 which addresses Charter School Appeals. The review committee is comprised of individuals with expertise in charter schools, academics, operations, and finance as demonstrated in the review committee report bios and review committee applications. All committee members are trained specifically in reviewing applications prior to beginning the review of the application.

**Documents:** TDOE application and rubric, review committee report with bios, public hearing notes, capacity interview notes, executive director's report and resolutions, rule 1185-01-01 and TPCSC policy 2.000, and Nashville Classical II, Academy for the Arts, and Rutherford Collegiate Prep review file to demonstrate that these standards and procedures were followed

- iii. Internal and external evaluators go through an application process to be deemed eligible and qualified to participate on a review committee. Review committee members are required to demonstrate expertise in charter schools, educational leadership, governance, organizational management, finance, and/or legal matters. Review committees are then assembled to reflect a combination of these areas of expertise. Review committee members are then trained specifically in how to review charter applications and feedback is provided to reviewers upon receipt of the initial rubric and final rubric. Review committee members are also able to provide the Commission feedback on the process upon conclusion of a review.

**Documents:** review committee report with bios, review committee members applications, initial review summary prep call document, review committee survey

- iv. Members of each review committee are trained on reviewing applications prior to beginning the review process. During this training, they are also given greater context of the application that they will be reviewing (e.g. ASD applications), when applicable and necessary. The training covers evaluation standards and practices, real or perceived conflicts of interest, observance of the process and protocol, review timelines, and fair/unbiased treatment of the applicant. Reviewers are also required to participate in a prep call prior to the capacity interview to ensure that they are familiar with how the interview will be conducted and that the process is normed and consistent with all other application processes.

**Documents:** Review committee COIs, review committee training and slide deck, prep call agenda/notes, capacity interview script and notes

- v. Conflict of interest statements are required for every evaluator conducting a review of an application to provide confirmation that applicants are free from any potential or perceived conflicts of interest between reviewers or decision makers and applicants.

**Documents:** Review committee COIs

- vi. During FY 2022, the Commission reviewed two separate applications and one of those applications, Nashville Classical II was approved, as the application presented a detailed plan for the school opening, a sound operation plan, and demonstrated fiscal stability. The approval of this application is documented in board meeting minutes, application rubrics, the executive director's report, and review committee report.

**Documents:** Nashville Classical II and Academy of the Arts application and process including review committee rubrics and final report, board meeting agenda, minutes, and executive director report



Standard 2e - Elements for Existing School Operators or Applications (if applicable).		0	1	2	3	4
Sub-standards						
i.	Provide clear evidence of their capacity to operate new schools successfully while maintaining quality in existing schools;					4
ii.	Document their educational, organizational, and financial performance records based on all existing schools;					4
iii.	Explain any never-opened, terminated, or non-renewed schools (including terminated or non-renewed third-party contracts to operate schools);					4
iv.	Present their growth plan, business plan, and most recent financial audits;					4
v.	Meet high standards of academic, organizational, and financial success to earn approval for replication; and					4
vi.	Document any current or past litigation and the resolution of such litigation.					4
Standard Rating						4.0
Explanation (limited to 500 words):						
i.	The Commission utilizes TDOE’s new start application and rubric which requires that the applicant provide clear evidence of their capacity to operate new schools successfully while maintaining quality in existing schools.					
Documents: TDOE application and rubric; Rutherford Collegiate Prep review, particularly as it relates to analysis on capacity to operate new school while maintaining NCP.						
ii.	The Commission utilizes TDOE’s new start application and rubric which requires that the applicant documents their educational, organizational, and financial performance records based on all existing schools.					
Documents: TDOE application and rubric						
iii.	The Commission utilizes TDOE’s new start application and rubric which requires that the applicant explain any never-opened, terminated, or non-renewed schools (including terminated or non-renewed third-party contracts to operate schools).					
Documents: TDOE application and rubric						

- iv. The Commission utilizes TDOE's new start application and rubric which requires that the applicant present their growth plan, business plan, and most recent financial audits.

**Documents:** TDOE application and rubric

- v. The Commission utilizes TDOE's new start application and rubric which considers previous academic, organizational, and financial performance. Applicants are only approved if they provide evidence of high standards in each of these areas.

**Documents:** TDOE application and rubric, Nashville Classical II application, rubric, and records demonstrating "high standards"

- vi. The Commission utilizes TDOE's new start application and rubric which requires applicants to disclose any current or past litigations and the resolution of such litigation.

**Documents:** TDOE application and rubric

**Standard 2f - Elements for Applicants Proposing to Contract with Educational Service Providers, including Charter Management Organizations (if applicable).**

**Sub-standards**

	0	1	2	3	4
i. Evidence of the service provider's educational and management success;					4
ii. A description of the process for selecting the ESP;					4
iii. A draft (or existing) service/management contract that sets forth proposed key terms, including roles and responsibilities of the school governing board, the school staff, and the service provider; the services and resources to be provided; performance-evaluation measures and mechanisms; detailed explanation of compensation to be paid to the provider; financial controls and oversight; investment disclosure; methods of contract oversight and enforcement; and conditions for contract renewal and termination; and					4
iv. Disclosure and explanation of any existing or potential conflicts of interest between the school governing board and proposed service provider or any affiliated business entities.					4
<b>Standard Rating</b>					<b>4.0</b>

**Explanation (limited to 500 words):**

- i. The Commission utilizes TDOE's new start application and rubric which requires an applicant provide evidence of success specific to academics, financial, and organizational performance.

**Documents:** TDOE application and rubric

- ii. The Commission utilizes TDOE's new start application and rubric which requires that an applicant intending to contract with an educational service provider includes a description of the process for selecting the ESP.

**Documents:** TDOE application and rubric

- iii. The Commission utilizes TDOE's new start application and rubric which requires that a draft (or existing) service/management contract that sets forth proposed key terms, roles and responsibilities of the school governing board, staff, and the service provider; performance evaluation measures and mechanisms, a detailed explanation of compensation to be paid to the provider; financial controls and oversight; methods of contract oversight and enforcement; and conditions for contract renewal and termination.

**Documents:** TDOE application and rubric, Nashville Classical II or Rutherford Collegiate Prep

- iv. The Commission utilizes TDOE's new start application and rubric which requires disclosure and explanation of any existing or potential conflicts of interest between the school governing board and proposed service provider or any affiliated business entities.

**Documents:** TDOE application and rubric, Nashville Classical II or Rutherford Collegiate Prep

<b>Standard 3a - Charter Agreement Term, Negotiation, and Execution.</b>					
<b>Sub-standards</b>					
	<b>0</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>
i. Executes a charter agreement with a legally incorporated governing board independent of the authorizer.					4
ii. Grants charter agreements for an initial term of ten operating years with a high-stakes review every five years, in addition to annual performance reports.					4
iii. Defines material and non-material terms of the charter agreement.					4
iv. Ensures mutual understanding and acceptance of the terms of the charter agreement by the school's governing board.					4
v. Allows—and requires charter agreement amendments for—occasional material changes to a school's plans, but does not require amending the charter agreement for non-material modifications.				3	
<b>Standard Rating</b>					<b>3.8</b>
<b>Explanation (limited to 500 words):</b>					
<p>i. Charter agreements are executed between the Commission and the legally incorporated governing board, independent of the authorizer, as set forth in Commission Policy 3.100 Charter Agreements. Agreements are signed by the Commission Executive Director, Commission Chair, and notarized when signed by the president/chair of the governing board member of the authorized school. Current, executed agreements are posted on the Commission's website.</p> <p><b>Documents:</b> Charter Agreement, Commission Policy 3.100 Charter Agreements</p> <p>ii. The Commission will grant contracts for a ten-year term with a high-stakes interim review in year five (5) and a high-stakes review at the end of each term to determine whether the charter agreement will be renewed. These terms are explicitly included in every charter agreement and further supported by section 5.b of Commission Policy 3.100 Charter Agreements.</p> <p><b>Documents:</b> Charter Agreement, Commission Policy 3.100 Charter Agreements</p> <p>iii. Charter agreements that are executed by the Commission define material and non-material terms of the charter agreement including, but not limited to charter school governance, financial, operational, or academic structure. Specifically, the agreement addresses changes in governance structure, addition or changes to a charter management organization, addition or removal of grade level(s), change in student enrollment outside of thresholds set in the agreement, addition or removal of transportation, change to location, change to academic focus, and material changes, as outlined in Commission rule 1185-01-01-.04.</p>					

**Documents:** Charter Agreement, Commission Policy 3.100 Charter Agreements, Commission rule 1185-01-01-.04

- iv. Per Commission policy 3.100, the Commission will make best efforts to ensure mutual understanding and acceptance of the terms of the charter agreement by the charter school's governing body prior to agreement approval. In negotiating the agreements, the Commission shares the agreement in advance, and offers to set up a call to discuss any questions or terms for negotiations. Agreements are signed by the Commission Executive Director, Commission Chair, and notarized when signed by the president/chair of the governing board member of the authorized school.

**Documents:** Charter Agreement, Commission Policy 3.100 Charter Agreements, email to operator regarding draft agreement

- v. Commission Policy 3.100 will allow and require charter agreement amendments for occasional material changes to a charter school's plans subject to the approval of both parties, but will not require amending the charter agreement for non-material modifications to a charter school's plans, where a material change is one which would be relevant and significant to a renewal decision. Should a school require an amendment to their charter agreement, the process, timeline, and expectations are clearly communicated through meetings and correspondence with school leadership. Moving forward, the Commission will post additional guidance and materials on its website for its schools to utilize.

**Documents:** Commission Policy 3.100, TDOE amendment application, Cornerstone Prep amendment file

<b>Standard 3b - Rights and Responsibilities.</b>					
<b>Sub-standards</b>					
	0	1	2	3	4
i. Executes charter agreements that clearly: <ul style="list-style-type: none"> <li>a. State the rights and responsibilities of the school and the authorizer;</li> <li>b. State and respect the autonomies to which schools are entitled—based on statute, waiver, or authorizer policy—including those relating to the school’s authority over educational programming, staffing, budgeting, and scheduling;</li> <li>c. Define performance standards, criteria, and conditions for renewal, intervention, revocation, and non-renewal, while establishing the consequences for meeting or not meeting standards or conditions;</li> <li>d. State the statutory, regulatory, and procedural terms and conditions for the school’s operation;</li> <li>e. State reasonable pre-opening requirements or conditions for new schools to ensure that they meet all health, safety, and other legal requirements prior to opening and are prepared to open smoothly;</li> <li>f. State the responsibility and commitment of the school to adhere to essential public-education obligations, including admitting and serving all eligible students so long as space is available, and not expelling or counseling out students except pursuant to a legal discipline policy approved by the authorizer; and</li> <li>g. State the responsibilities of the school and the authorizer in the event of school closures.</li> </ul>					4
ii. Ensures that any fee-based services that the authorizer provides are set forth in a services agreement that respects charter school autonomy and treats the charter school equitably compared to district schools, if applicable; and ensures that purchasing such services is explicitly not a condition of charter approval, continuation, or renewal.				3	
<b>Standard Rating</b>					<b>3.5</b>
<b>Explanation (limited to 500 words):</b>					

- i. Executed charter agreements address the rights and responsibilities of the school and authorizer, defines the performance standards in Exhibit 2, the pre-opening requirements in Exhibit 3, and the schools authority and discretion over educational programs, and Commission Policy 3.100 further describes the responsibility and commitment of the school to adhere to essential public-education obligations, including admitting and serving all eligible students, and includes the responsibilities of each party in the event of closure. Commission Policy 3.200 affirms the autonomy of the charter schools authorized by the Commission, under which the Commission serves as the authorizer.

**Documents:** Executed Charter agreement, Commission policy 3.100, Commission policy 3.200

- ii. Section 9.2 of the charter agreement addresses Fee for Services Agreements and is further described in Commission Policy 3.100. The Commission will ensure that any fee-based services provided by the Commission are set forth in a services agreement that is separate from the charter agreement and ensure that the purchase of such services is not and will never be a condition of charter approval, continuation, modification, or renewal.

**Documents:** Commission Policy 3.100, Charter agreement



<b>Standard 3c - Performance Standards</b>					
<b>Sub-standards</b>					
	<b>0</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>
<p>i. Executes charter agreements that plainly:</p> <ul style="list-style-type: none"> <li>a. Establish the performance standards under which schools will be evaluated, using objective and verifiable measures of student achievement as the primary measure of school quality, in accordance with state law;</li> <li>b. Define clear, measurable, and attainable academic, financial, and organizational performance standards and targets that the school must meet as a condition of renewal, including but not limited to state and federal measures; (See Paragraph ii., Performance standards detailed information.)</li> <li>c. Include expectations for appropriate access, education, support services, and outcomes for students with disabilities;</li> <li>d. Define the sources of academic data that will form the evidence base for ongoing and renewal evaluation, including state-mandated and other standardized assessments, student academic growth measures, internal assessments, qualitative reviews, and performance comparisons with other public schools in the district and state;</li> <li>e. Define the sources of financial data that will form the evidence base for ongoing and renewal evaluation, grounded in professional standards for sound financial operations and sustainability;</li> <li>f. Define the sources of organizational data that will form the evidence base for ongoing and renewal evaluation, focusing on fulfillment of legal obligations, fiduciary duties, and sound public stewardship; and</li> <li>g. Include clear, measurable performance standards to judge the effectiveness of alternative model schools, as defined by state law—requiring and appropriately weighting rigorous mission-specific performance measures and metrics that credibly demonstrate each school’s success in fulfilling its mission and serving its special population.</li> </ul>					4
<p>ii. Sets detailed performance standards. Performance standards enable schools and authorizers to know the outcomes for which authorizers will hold schools accountable. They are the basis for school evaluation and should be incorporated in the charter agreement, commonly as an attachment. Academic, financial, and organizational performance standards should include clearly defined and measurable indicators, measures, metrics, and targets that:</p> <ul style="list-style-type: none"> <li>a) Academic Performance <ul style="list-style-type: none"> <li>1. Set expectations for student academic achievement status or proficiency, including comparative proficiency;</li> </ul> </li> </ul>					4

<ul style="list-style-type: none"> <li>2. Set expectations for student academic growth, including adequacy of growth toward state standards;</li> <li>3. Incorporate state and federal accountability systems, including state grading and/or rating systems;</li> <li>4. Set expectations for postsecondary readiness, including graduation rates (for high schools); and</li> <li>5. Provide schools an option to incorporate mission-specific performance measures for which the school has presented valid, reliable, and rigorous means of assessment approved by the authorizer.</li> </ul> <p>b) Financial Performance</p> <ul style="list-style-type: none"> <li>1. Enable the authorizer to monitor and evaluate the school's financial stability and viability based on short-term performance; and</li> <li>2. Enable the authorizer to monitor and evaluate the school's long-term financial sustainability.</li> </ul> <p>c) Organizational Performance</p> <ul style="list-style-type: none"> <li>1. Define the essential elements of the educational program for which the authorizer will hold the school accountable;</li> <li>2. Define financial management and oversight standards based on generally accepted accounting principles;</li> <li>3. Hold school governing boards accountable for meeting statutory and board-established operating and reporting requirements;</li> <li>4. Ensure school compliance with student and employee rights and obligations; and</li> <li>5. Establish expectations related to the school environment, including health and safety, transportation, facilities, and appropriate handling of records.</li> </ul>					
Standard Rating					4.0
Explanation (limited to 500 words):					

- i. Charter agreements that are executed establish a consistent performance framework, which is included in Exhibit 2 of the agreement and further supported by Commission Policy 3.700 Charter School Performance Framework. The framework aligns with the requirements in T.C.A. § 49-13-143, which requires authorizers to use a performance framework for all schools aligned to the Tennessee Department of Education’s model framework. The data sources and performance standards address state-mandated and other standardized assessments specific to student academic growth measures, internal assessments, qualitative reviews, and performance comparisons with other schools within the district and state. The framework also defines clear and measurable academic, financial, and organizational performance standards and describes the targets that must be met as a condition for renewal. The performance framework also addresses students with disabilities weighting rigorous mission-specific performance measures and metrics that credibly demonstrate each school’s success in fulfilling its mission and serving its special population.

**Documents:** Charter agreement, Commission Policy 3.700

- ii. The Performance Framework outlined in Commission Policy 3.700 aligns with T.C.A. § 49-13-143 and enables schools and the authorizer to have mutual understanding of the outcomes for which the Commission will hold the school accountable. In essence, the performance framework is the basis for school evaluation and is incorporated in exhibit 2 of the charter agreement. The performance framework clearly defines the academic, financial, and organizational performance standards and includes measurable indicators, metrics, and targets. Specifically, the academic performance portion of the standards sets expectations for academic achievement including comparative proficiency, adequate growth towards state standards, incorporates state and federal accountability systems, includes graduation rates, and provides schools an option to incorporate mission-specific performance measures. The financial performance section of the framework evaluates financial stability and viability based on short-term and long-term indicators. The organizational performance section describes the essential elements of the educational program for which the school will be held accountable and defines financial management and oversight standards based on generally accepted accounting principles. This portion also incorporates oversight of the governing board to ensure they are meeting statutory and board-established operating and reporting requirements and that the school complies with student and employee rights. The organizational performance portion of the framework also incorporates expectations related to school environment, health and safety, transportation, facilities, and handling of records.

**Documents:** Charter agreement, Commission Policy 3.700

**Standard 3d - Provisions for Educational Service Provider (ESP) Within Charter Agreement (if applicable).**

**Sub-standards**

	0	1	2	3	4
<p>i. Includes, for any school that contracts with an ESP provider for the management of its educational program, finances, or school operations, contractual provisions that:<sup>1</sup></p> <ul style="list-style-type: none"> <li>a. Clearly establish the primacy of the charter agreement over the ESP contract;</li> <li>b. Clearly identify the school governing board as the party ultimately responsible for the success or failure of the school, and clearly define the ESP as a vendor of services;</li> <li>c. Prohibit the ESP from selecting, approving, employing, compensating, or serving as school governing board members;</li> <li>d. Provide for sufficient transparency around the spending of public monies; and</li> <li>e. Require all instructional materials, furnishings, and equipment purchased or developed with public funds to be the property of the school, not the ESP, in compliance with state law.</li> </ul>				3	
<b>Standard Rating</b>					<b>3.0</b>

**Explanation (limited to 500 words):**

- i. Section 9.3.1 External Service Provider (ESP) Contracts of the Commission's charter agreement includes for any school that contracts with an ESP provider for the management of its educational program, finances, or school operations, the contractual provisions that establish the primacy of the charter agreement over the ESP contracts, prohibits the ESP from selecting, approving, employing, compensating, or serving as a school governing board member, and provides transparency around the spending of public money. Moving forward, the Commission will add language to its policies and contracts that clearly address the school's governing board as the party ultimately responsible for the success or failure of the school(s), define the ESP as a vendor, and that all instructional materials remain the property of the school, and not the ESP.

**Documents:** Nashville Collegiate Prep Charter Agreement

<sup>1</sup> The standard does not apply to contracts with ESPs that do not have substantial responsibility for education, operational, and financial operations such as for payroll, textbooks, curriculum, etc.

<b>Standard 3e - Provisions for ESP Contract</b>					
<b>Sub-standards</b>					
	<b>0</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>
i. The roles and responsibilities of the school governing board and the ESP, including all services to be provided under the contract;					4
ii. The performance measures, consequences, and mechanisms by which the school governing board will hold the ESP accountable for performance, aligned with the performance measures in the charter agreement;					4
iii. All compensation to be paid to the ESP including all fees, bonuses, and what such compensation includes or requires;					4
iv. Terms of any facility agreement that may be part of the relationship;					4
v. Financial reporting requirements and provisions for the school governing board's financial oversight;	0				
vi. All other financial terms of the contract, including disclosure and documentation of all loans or investments by the ESP to the school, and provision for the disposition of assets in accordance with law;					4
vii. Assurances that the school governing board, at all times, maintains independent fiduciary oversight and authority over the school budget and ultimate responsibility for the school's performance;					4
viii. Provisions for contract termination; and					4
ix. Respective responsibilities of the governing board and ESP in the event of school closure, including transparency in the school's revenues and expenditures, as well as those managed by the ESP.					4
<b>Standard Rating</b>					<b>3.6</b>
<b>Explanation (limited to 500 words):</b>					
<p>i. Section 9.3.1.a. External Service Provider (ESP) Contracts of the Commission's charter school agreement requires that the contract between the school governing board and ESP articulates the roles and responsibilities of the school governing board and the ESP, including all services to be provided under the contract as evidenced by Nashville Collegiate Prep's charter agreement.</p> <p><b>Documents:</b> Nashville Collegiate Prep Charter Agreement</p> <p>ii. The Section 9.3.1.b. External Service Provider (ESP) Contracts of the Commission's charter school agreement requires that the contract between the school governing board and ESP articulates the performance measures, consequences, and mechanisms by which the school governing board will hold</p>					

the ESP accountable for performance, aligned with the performance measures in the charter agreement as evidenced by Nashville Collegiate Prep's charter agreement.

**Documents:** Nashville Collegiate Prep Charter Agreement

- iii. Section 9.3.1.c. External Service Provider (ESP) Contracts of Commission's charter school agreement requires that the contract between the school governing board and ESP articulates all compensation to be paid to the ESP including all fees, bonuses, and what such compensation includes or requires in the charter agreement as evidenced by Nashville Collegiate Prep's charter agreement.

**Documents:** Nashville Collegiate Prep Charter Agreement

- iv. Section 9.3.1.d. External Service Provider (ESP) Contracts of the Commission's charter school agreement requires that the contract between the school governing board and ESP articulates the terms of any facility agreement that may be part of the relationship in the charter agreement as evidenced by Nashville Collegiate Prep's charter agreement.

**Documents:** Nashville Collegiate Prep Charter Agreement

- v. Section 9.3.1 External Service Provider (ESP) Contracts of the Commission's charter school agreement does not include language requiring that the contract between the school governing board and ESP to articulate financial reporting requirements and provisions for the school governing board's financial oversight. Moving forward, the Commission will update the contract to include this language to Section 9.3.1.e.
- vi. Section 9.3.1.f. External Service Provider (ESP) Contracts of the Commission's charter school agreement requires that the contract between the school governing board and ESP articulates all other financial terms of the contract, including disclosure and documentation of all loans or investments by the ESP to the school, and provision for the disposition of assets in accordance with law in the charter agreement as evidenced by Nashville Collegiate Prep's charter agreement.

**Documents:** Nashville Collegiate Prep Charter Agreement

- vii. Section 9.3.1.g. External Service Provider (ESP) Contracts of the Commission's charter school agreement requires that the contract between the school governing board and ESP articulates assurances that the school governing board, at all times, maintains independent fiduciary oversight and authority over the school budget and ultimate responsibility for the school's performance in the charter agreement as evidenced by Nashville Collegiate Prep's charter agreement.

**Documents:** Nashville Collegiate Prep Charter Agreement

- viii. Section 9.3.1.h. External Service Provider (ESP) Contracts of the Commission's charter school agreement requires that the contract between the school governing board and ESP articulates provisions for contract termination in the charter agreement as evidenced by Nashville Collegiate Prep's charter agreement.

**Documents:** Nashville Collegiate Prep Charter Agreement

- ix. Section 9.3.1.i. External Service Provider (ESP) Contracts of Commission's charter school agreement requires that the contract between the school governing board and ESP articulates respective responsibilities of the governing board and ESP in the event of school closure, including transparency in the school's revenues and expenditures, as well as those managed by the ESP in the charter agreement as evidenced by Nashville Collegiate Prep's charter agreement.

**Documents:** Nashville Collegiate Prep Charter Agreement

<b>Standard 4a - Performance Evaluation and Compliance Monitoring.</b>					
<b>Sub-standards</b>					
	<b>0</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>
i. Implements a comprehensive performance accountability and compliance monitoring system that is defined by the charter agreement and provides the information necessary to make rigorous and standards-based renewal, revocation, and intervention decisions.					4
ii. Defines and communicates to schools the process, methods, and timing of gathering and reporting school performance and compliance data.					4
iii. Implements an accountability system that effectively streamlines federal, state, and local performance expectations and compliance requirements while protecting schools' legally entitled autonomy and minimizing schools' administrative and reporting burdens.					4
iv. Provides clear technical guidance to schools as needed to ensure timely compliance with applicable rules and regulations.					4
v. Visits each school as appropriate and necessary for collecting data that cannot be obtained otherwise and in accordance with the contract, while ensuring that the frequency, purposes, and methods of such visits respect school autonomy, minimize administrative burdens, and avoid operational interference.					4
vi. Evaluates each school annually on its performance and progress toward meeting the standards and targets stated in the charter agreement, including essential compliance requirements, and clearly communicates evaluation results to the school's governing board and leadership.				3	
vii. Requires and reviews annual financial audits of schools, conducted by a qualified independent auditor.					4
viii. Communicates regularly with schools as needed, including both the school leaders and governing boards, and provides timely notice of contract violations or performance deficiencies.					4
ix. Provides an annual written report to each school, summarizing its performance and compliance to date and identifying areas of strength and areas needing improvement.					4
x. Articulates and enforces stated consequences for failing to meet performance expectations or compliance requirements.					4
<b>Standard Rating</b>					<b>3.9</b>
<b>Explanation (limited to 500 words):</b>					



- i. The Commission implements a comprehensive performance accountability and compliance monitoring system, as defined by the charter agreement, and provides the information necessary to make rigorous and standards-based renewal, revocation, and intervention decisions. Within the charter agreement, the Commission includes the performance framework which is utilized for the purposes of accountability, renewal, and/or revocation evaluation and supersedes all assessment measures, educational goals and objectives, financial operations metrics, and organizational performance metrics set forth in the charter school's application. The charter agreement also describes a Master Reporting Calendar, which is provided annually and sets out key deadlines for the charter school to provide certain information and reports. These practices are further supported and articulated in Commission Policy 3.100 Charter Agreement, Policy 3.400 Charter Intervention, and Policy 3.700 Performance Framework. Lastly, the Commission conducts regular desktop audits which procedures are outlined in external facing protocol and procedure documents and has recently adopted the practice of providing quarterly compliance monitoring reports and missing and inappropriate documentation memos, which provide schools with timely feedback related to compliance and performance.

**Documents:** Charter agreement, master reporting calendar, special populations desktop monitoring protocol, quarterly monitoring letters, missing and inappropriate documentation memo, Commission Policies 3.100, 3.400, and 3.700

- ii. The process, method, and timing of gathering and reporting school performance and compliance data is communicated through the annual Master Reporting Calendar and special populations desktop monitoring protocols (Separate documents for: Special Ed, 504, ILP, and gifted). The LEA team also provides technical support through individualized meetings and training. The Commission also sends newsletters out every two weeks, which includes upcoming deadlines and other important resources.

**Documents:** Master reporting calendar, special populations desktop monitoring protocol, LEA calendar demonstrating regular meetings with schools, bi-weekly newsletter

- iii. The annual Performance Framework, Master Reporting Calendar and Special Populations Protocol are utilized by the Authorizing and LEA team to communicate federal, state, and local performance expectations and compliance requirements. These documents protect school autonomy and minimize burden as they clearly articulate the performance and compliance expectations, allow sufficient time for submittals, and the Commission utilizes Box, Teams, or other online drop boxes to allow for easy submission of required documents.

**Documents:** Master Reporting Calendar, Performance Framework, special populations desktop monitoring protocol, screenshots of Box/Teams/other submissions

- iv. The LEA team regularly communicates with the schools that it authorizes regarding upcoming deadlines and provides guidance as needed to ensure timely compliance with applicable rules and regulations. Regular and ongoing communication includes regular meetings with each school's designated administrator that is responsible for compliance. For example, the LEA team may meet with a newly opened school on a weekly basis and a school that has been in operation for a longer period of time one time per month. The authorizing and LEA team also meet monthly with schools that are in the pre-opening process to provide training specific to reporting, compliance, budgeting, governance, teacher licensure, and many other applicable rules and regulations. The Commission also sends bi-weekly newsletters to the schools it authorizes which includes updates after legislative sessions, and State Board meetings.

**Documents:** Calendar showing regular LEA Team meetings with charter school leaders, Pre-opening monthly meeting including schedule of trainings and presentations/slide decks, bi-weekly newsletter

- v. In accordance with Commission policy 3.300, Oversight and Evaluation, the Commission staff visits each school site annually to collect the necessary data that cannot be obtained otherwise and in accordance with the contract, while also ensuring that the frequency, purpose, and methods respect school autonomy, minimize administrative burden, and avoid operational interference. The authorizing team meets with each school beginning in December to cover the annual site visit schedule, site visit protocol, discuss interviews that will be conducted during the site visit, deadlines for submitting required documentation, and templates for providing performance data. The federal programs team and the special populations team also schedule their on-site monitoring at the same time. This allows the school sufficient time for ensuring the site visit is scheduled at a mutually agreed upon date, gathering and submitting the requested documents, preparing for the spring site visit, and minimizes administrative burden and operational interference.

**Documents:** Commission policy 3.300, December site visit prep call slide deck, emails scheduling site visit, site visit protocol, data collection slide deck

- vi. The charter agreement states that the authorizer will conduct an annual scheduled comprehensive site visit each year in accordance with Commission policy 3.300, Oversight and Evaluation. The Commission has a site-visit protocol that articulates an overview of the site visit, the steps the school should take to prepare for the visit, the site visit structure, and the evaluation criteria. Upon conclusion of a site visit, the Commission will provide each school with a written report. Moving forward, the Commission will ensure that evaluation results are shared with governing board members.

**Documents:** Commission policy 3.300, December site visit prep call slide deck, emails scheduling site visit, site visit protocol, data collection slide deck

- vii. The charter agreement requires each charter school to undergo an independent financial audit conducted in accordance with T.C.A. §§ 49-13-111 (I) and 49-13-127 and requires annual submission of the audit, which shall be furnished to the authorizer, the Commissioner of Education, and the Comptroller of the Treasury by December 31 of each year in accordance with the authorizer's reporting calendar. The audit is reviewed against the performance framework and any findings or material weaknesses result in the Commission's request for a potential review and an explanation from the charter school.

**Documents:** Charter school agreement, master calendar, in the future: annual audit, documentation of review, additional documents and communication should an audit include a finding, qualified opinion, or material weakness

- viii. The Commission provides bi-weekly newsletters to charter school leaders to provide regular and ongoing communication related to legislative updates, upcoming deadlines, compliance requirements, and trainings. Performance and desktop audits are also conducted throughout the year, with feedback being provided at the conclusion of each review through a missing and inappropriate documentation memo. The Commission also provides quarterly performance reviews which documents any contract violations or performance deficiencies.

**Documents:** Newsletter, documentation of special populations desktop audits along with missing and inappropriate documentation memo, quarterly performance review letters

- ix. While the Commission was not subject to school annual reporting during SY 2019-20 and SY 2020-21, beginning SY 2021-22 the Commission will provide an annual written report to each school summarizing its performance and compliance to date and identifying areas of strengths and areas needing improvement. In addition to the annual feedback, which is a culmination of annual reporting, the site visit, and other reporting periods throughout the year, the Commission recently began providing feedback to each school regarding their strengths and areas needing improvement or focus on a quarterly basis through quarterly monitoring letters.

**Documents:** Quarterly monitoring letters, site visit protocol, charter agreement

- x. Commission Policy 3.400 Charter School Intervention articulates the consequences and steps to be taken should a school fail to meet performance expectations or compliance requirements. This policy is referenced in the charter agreement along with the performance framework, which is the primary mechanism for evaluating a school's academic, organizational, and financial performance. The Commission also utilizes the intervention policy, should a deficiency be identified throughout the regular reporting calendar and quarterly monitoring.

**Documents:** Charter school agreement, Policy 3.400 Charter School Intervention, Performance Framework, monthly reporting calendar, quarterly reviews

Standard 4b - Respecting School Autonomy.		0	1	2	3	4
Sub-standards						
i.	Respects the school’s authority over its day-to-day operations.					4
ii.	Collects information from the school in a manner that minimizes administrative burdens on the school, while ensuring that performance and compliance information is collected with sufficient detail and timeliness to protect student and public interests.					4
iii.	Periodically reviews compliance requirements and evaluates the potential to increase school autonomy based on flexibility in the law, streamlining requirements, demonstrated school performance, or other considerations.					4
iv.	Refrains from directing or participating in educational decisions or choices that are appropriately within a school’s purview under the charter law or contract.					4
Standard Rating						4.0
Explanation (limited to 500 words):						
<p>i. The Commission respects the school’s authority over its day-to-day operations as articulated in the charter agreement which addresses the autonomies to which charter schools are entitled based on statute, waiver, and Commission rule and policy, including those related to educational program, governance and management, operations and finance. This respect is further demonstrated in the Commissions regular practices which include clear communication of compliance and reporting requirements through a regular reporting calendar and bi-monthly newsletters, special populations desktop monitoring protocols, a site visit protocol that clearly articulates the site visit process, pre-opening checklists, and provides opportunity for school feedback annually.</p> <p><b>Documents:</b> Charter agreement, reporting calendar, newsletters, special populations desktop monitoring protocols, site visit protocol, pre-opening checklist, end of year survey</p> <p>ii. Schools currently utilize Box as the primary tool for submitting data, reports, and other information to the Commission. This minimizes the administrative burden on the school, as it provides a centralized location for submission, protects sensitive information, and that sufficient detail can be provided.</p> <p><b>Documents:</b> Screenshots of box reflecting submission of items included on monthly reporting calendar</p> <p>iii. The Commission periodically reviews compliance requirements and evaluates previous requirements to streamline processes, update language based on changes in law, and increase autonomy specifically for schools that have demonstrated performance. This is evidenced through an annual review of</p>						

the master reporting calendar, special populations desktop monitoring protocols, pre-opening checklist and protocols, site visit checklist and protocols, and evaluation of the performance framework to improve authorizing standards and to ensure the Commission is authorizing high quality schools.

**Documents:** Master reporting calendar, special populations desktop monitoring protocols, pre-opening checklist and protocol, site visit checklist and protocols, performance framework, include emails and calendar where these items were specifically reviewed and updated

- iv. While the Commission provides regular and ongoing feedback to its schools on a quarterly and annual basis, staff refrains from directing or participating in educational decisions or choices that are within the school's purview under the charter law or contract.

**Documents:** Quarterly monitoring letters, missing and inappropriate documentation memos, emails from LEA staff providing feedback, in the future: annual performance reports

<b>Standard 4c - Protecting Student Rights.</b>					
<b>Sub-standards</b>					
	<b>0</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>
i. Ensures that schools admit students through a random selection process that is open to all students, is publicly verifiable, and does not establish undue barriers to application (such as mandatory information meetings, mandated volunteer service, or parent contracts) that exclude students as provided by federal, state, and local law.				3	
ii. Ensures that schools provide equitable access and inclusive services to all students as required by applicable federal and state law, including, but not limited to, students with disabilities, English learners, homeless students, students in foster care, migrant students, and gifted students.					4
iii. Ensures clarity in the roles and responsibilities of all parties involved in serving students with disabilities.					4
iv. Ensures that schools' student discipline policies and actions are legal, fair, and equitable and that no student is suspended, expelled, or counseled out of a school outside of that process, and that schools have a clear process for addressing parent/ community grievances.				3	
<b>Standard Rating</b>					<b>3.5</b>
<b>Explanation (limited to 500 words):</b>					
<p>i. The Commission's charter agreement states that if the number of applications for the charter school exceeds the capacity of a program, class, grade level, or building, enrollment shall occur according to the preferences in T.C.A. § 49-13-113. If enrollment within a group of preference set out in subdivision (d)(4) exceeds the planned capacity of the charter school, enrollment within that group shall be determined on the basis of a lottery that complies with statute. The charter school may not "counsel out" or discourage students from attending the charter school for any reason, including but not limited to failure to comply with letters of commitment or similar proposed contracts between students and parents and the charter school. This is reviewed annually as a part of the performance framework and the lottery process is certified by the Department and reviewed by the Commission's LEA team, and feedback is provided if necessary. Moving forward, the Commission will include a review of the lottery process within the site visit protocols.</p> <p><b>Documents:</b> Charter agreement, performance framework certified lottery, documentation of review by LEA team and feedback, if applicable</p> <p>ii. Sections 1c and 1d of the Performance Framework specifically addresses the Commission's charge for ensuring that schools provide equitable access and inclusive services, as required by applicable federal and state law for students with disabilities and English learners. The Commission's Charter School Handbook, results-based monitoring, and special populations desktop monitoring protocol specifically address homeless students, students in</p>					

foster care, migrant students, and gifted students by describing the school's responsibility to provide training to staff and defines the responsibilities of the schools' points of contact. The special populations team communicates at least monthly with these points-of-contact to share any upcoming reporting deadlines or important updates via the special populations monthly check-ins. Further, the site visit protocol evidence reviews of the schools' practice specific for these special populations of students.

**Documents:** Performance Framework, Site visit protocol, Charter School Handbook (procedure), Results based monitoring, special populations desktop monitoring protocol, communication with special populations point of contact.

- iii. The charter agreement states that the charter school shall enroll students according to T.C.A. § 49-13-113. The charter school shall not discriminate with respect to admissions on the basis of race, color, ethnicity, religion, national origin, English language proficiency, sex, disability, or the need for special education and related services as set forth in the charter school's application and the Act. This is evaluated annually during the site visit and completion of the performance framework in section 1c.

**Documents:** Charter school agreement, site visit protocol and performance framework

- iv. The charter agreement states that the charter school may not "counsel out" or discourage students from attending the charter school for any reason, including but not limited to failure to comply with letters of commitment or similar proposed contracts between students and parents and the charter school, while the performance framework and site visit ensures that the school materially complies with applicable laws, rules, regulations, LEA policies and procedures, and provisions of the charter agreement (including the Individuals with Disabilities Education Act, Section 504 of the Rehabilitation Act of 1973, and the Americans with Disabilities Act) relating to the treatment of students with identified disabilities and those suspected of having a disability, including but not limited to: Equitable access and opportunity to enroll; Identification and referral; Appropriate development and implementation of Individualized Education Plans and Section 504 plans, in compliance with required timelines; Operational compliance, including provision of services in the least restrictive environment and appropriate inclusion in the school's academic program, assessments, and extracurricular activities; Discipline, including due process protections, manifestation determinations, and behavioral intervention plans; Access to the school's facility and program in a lawful manner and consistent with students' IEPs or Section 504 Plans; Securing and properly accounting for all applicable federal and state funding. If shortcomings during results-based monitoring, completion of the performance framework, special populations desktop monitoring, or at the site visit, the school is required to promptly come into compliance. Moving forward, the Commission will check school discipline policies and service providers schedules during site visits to ensure alignment of services described in IEPs, check for evidence of the schools' provision of adaptive/assistive technology or accessibility accommodations within the campus and review curricular materials used in schools' direct special education services.

**Documents:** Charter agreement, performance framework, results-based monitoring, special populations desktop monitoring, site visit protocol and checklist

Standard 4d - School Intervention		0	1	2	3	4
Sub-standards						
i.	Establishes and clearly communicates to schools at the outset an intervention and problem-solving policy that states the general conditions that may trigger intervention and the types of actions and consequences that may ensue.					4
ii.	Gives schools clear, adequate, evidence-based, and timely notice of contract violations or performance deficiencies.					4
iii.	Allows schools reasonable time and opportunity for remediation in non-emergency situations.					4
iv.	Applies professional discretion when intervention is needed and considers context and a range of effective solutions.				3	
v.	Where intervention is needed, engages in intervention strategies that clearly preserve school autonomy and responsibility (identifying what the school must remedy without prescribing solutions) while clearly stating possible consequences for noncompliance.					4
Standard Rating						3.8
Explanation (limited to 500 words):						
i.	While the Commission has not had to undergo a formal intervention, the Charter School Intervention Policy 3.400 that states general conditions that may trigger intervention, an overview of the intervention process, grounds for intervention and consequences, the charter school’s responsibility should the Commission undergo an intervention, and a table of interventions.					
Documents: Charter Intervention Policy 3.400						
iii.	While the Commission has not had to undergo a formal intervention, quarterly monitoring letters and missing and inappropriate documentation memos are provided in addition to an annual report, which provides schools with the necessary feedback to ensure they are on track and whether there are current compliance violations that need to be addressed in order to avoid possible intervention.					
Documents: Charter Intervention Policy 3.400, quarterly monitoring letters, missing and inappropriate documentation memos						
iii.	The Charter School Intervention Policy 3.400 explicitly states that the Commission shall provide its charter schools with reasonable time and opportunity for submission of Plan of Corrections and/or remediation in non-emergency situations. The LEA team regularly monitors compliance and provides training when necessary in order to provide additional opportunities to remedy non-emergency compliance issues. Additionally, the quarterly					



performance review letters give notice to schools of areas that may require additional organizational focus prior to the implementation of the Intervention Policy.

**Documents:** Charter Intervention Policy 3.400, LEA team trainings related to non-compliance, quarterly monitoring letters

- iv. The commission applies professional discretion when intervention is needed and considers the context and range of effective solutions as evidenced by the quarterly monitoring letters and missing and inappropriate documentation memos. These letters and memos, which are produced exercising professional discretion when determining what areas need to be covered and provide schools with areas that the school should focus on, without being punitive in non-emergency situations. Moving forward, the Commission will add language to procedures specifically addressing consideration of context and a range of effective solutions.

**Documents:** Quarterly monitoring letters, missing and inappropriate documentation memo

- v. The Charter Intervention Policy 3.400 states that where intervention is needed, the Commission shall engage in intervention strategies that preserve charter school autonomy and responsibility by identifying what the charter school must remedy without prescribing solutions. The policy also details possible consequences for noncompliance in the table of interventions.

**Documents:** Charter Intervention Policy 3.400

<b>Standard 4e - Public Reporting.</b>		<b>0</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>
<b>Sub-standards</b>						
i.	Produces an annual public report that provides clear, accurate performance data for the charter schools it oversees and reports on individual school and overall portfolio performance according to the framework set forth in the charter agreement in accordance with State law.	N/A				
<b>Standard Rating</b>						<b>N/A</b>
<b>Explanation (limited to 500 words):</b>						
i.	The Commission did not authorize schools during SY 2018-19 or SY 2019-20 and as a result has not yet been required to produce an annual public report on performance data for the charter schools that it authorizes.					

<b>Standard 5a - Revocation</b>		<b>0</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>
<b>Sub-standards</b>						
i.	Revokes a charter during the charter term if there is clear evidence of extreme underperformance or violation of law or the public trust that imperils students or public funds, in accordance with state law.					4
ii.	Does not make revocation decisions on the basis of political or community pressure.					4
<b>Standard Rating</b>						<b>4.0</b>
<b>Explanation (limited to 500 words):</b>						
<p>i. Commission Policy 3.500 Charter School Revocation with Commission as the Authorizer states that the Commission may revoke a charter agreement if it determines that the school failed to meet the minimum performance requirements set forth in the charter agreement; committed a material violation of any of the conditions, standards, or procedures set forth in the charter agreement; or failed to meet generally accepted standards of fiscal management. The revocation process includes a public hearing, a final recommendation by the Executive Director, and a Commission vote in order to demonstrate that revocation is considered by the authorizing office as a whole and is not limited to the authorizing board or the authorizing staff. As evidenced by Commission Policy 3.400 Charter Intervention, the Commission begins with intervention when material violations are noted and do not automatically move towards revocation unless violations are extreme and violate public trust that imperils students or public funds.</p> <p><b>Documents:</b> Commission Policy 3.500 Charter School Revocation with Commission Authorizer, Commission Policy 3.400 Charter Intervention</p> <p>ii. In accordance with Commission Policy 1.100 Commission Members and Commission Policy 2.100 Application Review, Commissioners and review committee members are required to complete conflict of interest statements in order to ensure that all work and decisions are free from conflicts of interest and any revocation decisions align with expectations and rely on evidence-based reviews and not outside factors.</p> <p><b>Documents:</b> Conflict of interest statements for Commissioners and Review Committee, Commission Policies 1.100 Commission Members and 2.100 Application Review</p>						

<b>Standard 5b - Renewal Decisions Based on Merit and Inclusive Evidence.</b>		<b>0</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>
<b>Sub-standards</b>						
i.	Bases the renewal process and renewal decisions on thorough analyses of a comprehensive body of objective evidence defined by the performance framework in the charter agreement.			N/A		
ii.	Grants renewal only to schools that have achieved the standards and targets stated in the charter agreement, are organizationally and fiscally viable, and have been faithful to the terms of the contract and applicable law.			N/A		
iii.	Does not make renewal decisions on the basis of political or community pressure or solely on promises of future improvement.			N/A		
<b>Standard Rating</b>						<b>N/A</b>
<b>Explanation (limited to 500 words):</b>						
i.	The authorizer did not have any schools facing renewal during SY 2019-20 or SY 2020-21.					
ii.	The authorizer did not have any schools facing renewal during SY 2019-20 or SY 2020-21.					
iii.	The authorizer did not have any schools facing renewal during SY 2019-20 or SY 2020-21.					

<b>Standard 5c - Cumulative Report and Renewal Application.</b>		<b>0</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>
<b>Sub-standards</b>						
i.	Provides to each school, in advance of the renewal decision, a cumulative performance report that: <ul style="list-style-type: none"> <li>a. Summarizes the school's performance record over the charter term; and</li> <li>b. States the authorizer's summative findings concerning the school's performance and its prospects for renewal.</li> </ul>	N/A				
ii.	Requires any school seeking renewal to apply for it through a renewal application, which provides the school a meaningful opportunity and reasonable time to respond to the cumulative report; to correct the record, if needed; and to present additional evidence regarding its performance.					4
<b>Standard Rating</b>						<b>4.0</b>
<b>Explanation (limited to 500 words):</b>						
i.	The authorizer did not have any schools facing renewal during SY 2019-20 or SY 2020-21.					
ii.	Commission Policy 3.600 Renewal of Commission-Authorized Charter Agreements outlines the renewal process, the application to be used for renewal, renewal criteria, renewal cumulative performance report, the renewal application review committee, renewal application evaluation, final recommendation and decision of the commission, and the renewal charter agreement. This detailed policy provides schools a meaningful opportunity and reasonable time to respond to the cumulative report and correct the record if needed, and provide additional evidence regarding its performance should it be necessary.					
<b>Documents:</b> Commission Policy 3.600 Renewal of Commission-Authorized Charter Agreements						

<b>Standard 5d - Fair, Transparent Process.</b>					
<b>Sub-standards</b>					
	0	1	2	3	4
i. Clearly communicates to schools the criteria for charter revocation, renewal, and non-renewal decisions that are consistent with the charter agreement, including any policy changes thereto.					4
ii. Promptly notifies each school of its renewal (or, if applicable, revocation) decision, including written explanation of the reasons for the decision.	N/A				
iii. Promptly communicates renewal or revocation decisions to the school community and public within a time frame that allows parents and students to exercise choices for the upcoming school year.	N/A				
iv. Explains in writing any available rights of legal or administrative appeal through which a school may challenge the authorizer's decision, including appeal to the Tennessee Public Charter School Commission.	N/A				
v. Regularly updates and publishes the process for renewal decision making, including guidance regarding required content and format for renewal applications.				3	
<b>Standard Rating</b>					<b>3.5</b>
<b>Explanation (limited to 500 words):</b>					
<p>i. Consistent with the charter agreement, the Commission articulates the criteria and process for charter revocation in Commission Policy 3.500 Charter School Revocation with Commission as Authorizer and states that the Commission may revoke a charter agreement if it determines that the school failed to meet the minimum performance requirements set forth in the charter agreement; committed a material violation of any of the conditions, standards, or procedures set forth in the charter agreement; or failed to meet generally accepted standards of fiscal management. The revocation process includes a public hearing, a final recommendation by the Executive Director, and a Commission vote in order to demonstrate that revocation is considered by the authorizing office as a whole and is not limited to the authorizing board or the authorizing staff. As evidenced by Commission Policy 3.400 Charter Intervention, the Commission begins with intervention when material violations are noted and do not automatically move towards revocation unless violations are extreme and violate public trust that imperils students or public funds. Commission Policy 3.600 Renewal of Commission-Authorized Charter Agreements outlines the renewal process, the application to be used for renewal, renewal criteria, renewal cumulative performance report, the renewal application review committee, renewal application evaluation, final recommendation and decision of the commission, and the renewal charter agreement. This detailed policy provides schools a meaningful opportunity and reasonable time to respond to the cumulative report and correct the record if needed and provide additional evidence regarding its performance should it be necessary. While the Commission has not undergone the renewal and revocation process, these policies will be referenced in all communication that occurs about revocation, renewal, and non-renewal.</p>					

**Documents:** Commission Policy 3.400 Charter Intervention, Commission Policy 3.500 Charter School Revocation with Commission as Authorizer and Commission, Policy 3.600 Renewal of Commission-Authorized Charter Agreements

- ii. The Commission did not have any schools facing renewal during SY 2019-20 or SY 2020-21.
- iii. The Commission did not have any schools facing renewal during SY 2019-20 or SY 2020-21.
- iv. The Commission did not have any schools facing renewal during SY 2019-20 or SY 2020-21.
- v. Commission Policy 3.600 Renewal of Commission-Authorized Charter Agreements is readily available on the TPCSC website and outlines the renewal process, the application to be used for renewal, renewal criteria, renewal cumulative performance report, the renewal application review committee, renewal application evaluation, final recommendation and decision of the commission, and the renewal charter agreement. This detailed policy provides schools a meaningful opportunity and reasonable time to respond to the cumulative report and correct the record if needed and provide additional evidence regarding its performance should it be necessary. The Commission regularly reviews policies and updates them as deemed necessary. While the Commission has not yet faced the renewal of a charter agreement, staff will begin codifying the methods and frequency of communicating this process to the schools within its portfolio.

**Documents:** Commission Policy 3.600 Renewal of Commission-Authorized Charter Agreements

<b>Standard 5e - Closure</b>					
<b>Sub-standards</b>					
	<b>0</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>
i. In the event of a school closure, oversees and works with the school governing board and leadership in carrying out a detailed closure protocol that ensures timely notification to parents; orderly transition of students and student records to new schools; and disposition of school funds, property, and assets in accordance with law.				3	
<b>Standard Rating</b>					<b>3.0</b>
<b>Explanation (limited to 500 words):</b>					
<p>i. In the event that a charter school closes, the charter agreement outlines that the charter school shall cooperate with the authorizer to ensure orderly closure including timely notification of parents and teachers of the decision, securing student records and transferring them to the LEA in which the school is located, assisting in placing students in appropriate schools, managing all financial records consistent with the authorizers requirements and policies, disposal of school assets in accordance with the agreement and any other policies or protocol established by the authorizer. Moving forward, the Commission will create a closing protocol to articulate additional details related to the closing process.</p> <p><b>Documents:</b> Charter Agreement</p>					



<b>Standard 6 - Advanced Standards (Optional)</b>		<b>0</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>
<b>Sub-standards</b>						
i.	Ensures authorizing is visible, adequately resourced, and the people responsible for day-to-day authorizing functions have input over decision making.					4
ii.	Articulates and implements an intentional strategic vision and plan for chartering, including clear priorities, goals, and time frames for achievement.					4
iii.	Evaluates its work regularly against its chartering mission and strategic plan goals, and implements plans for improvement when falling short of its mission and strategic plan.					4
iv.	Provides an annual public report on the authorizer's program and performance in meeting its strategic plan goals.					4
v.	Broadly invites and solicits charter applications while publicizing the authorizer's strategic vision and chartering priorities, without restricting or refusing to review applications that propose to fulfill other goals.					4
<b>Standard Rating</b>						<b>4.0</b>
<b>Explanation (limited to 500 words):</b>						
<p>i. The Commission ensures authorizing is visible, adequately resourced, and the people responsible for the day-to-day authorizing functions have input over decision making as evidenced by satisfying substandard 1a.vi, 1c.i, 1a.vii, 2b.i, 2b.iv, 2d.i, 5a.ii, and 5b.i.</p> <p><b>Documents:</b> Authorizer Self Evaluation substandard 1a.vi, 1c.i, 1a.vii, 2b.i, 2b.iv, 2d.i, 5a.ii, and 5b.i</p> <p>ii. The Commission articulates and implements an intentional strategic vision and plan for chartering, which includes clear priorities, goals, and time frames for achievement as evidenced by the TPCSC Strategic Plan.</p> <p><b>Documents:</b> Strategic Plan</p> <p>iii. The Commission regularly evaluates its work and authorizing standards and process against its chartering mission and strategic goals and implements plans for improvement when falling short of its mission and strategic plan. The Commission also regularly evaluates whether strategic goals require modifications or revisions based on changes of policies, laws, and the organizational vision.</p> <p><b>Documents:</b> Strategic Plan including process documents, interviews with staff and Commissioners soliciting feedback</p>						

- iv. Commission staff provides regular public reporting on the authorizer's strategic goals and updates Commissioners and the public regarding its performance in meeting its strategic plan goals.

**Documents:** Strategic plan, Commission meetings and slide decks where strategic plan is publicly discussed, interviews with Commissioners and staff to solicit feedback

- v. Upon denial of an application, amendment application, or revocation, Commission staff reaches out the following day to notify the applicant of their rights to appeal to the Commission to fulfill its responsibilities as an appellate authorizer and for no reason are applications restricted or refused. This aligns with the Commissions mission, vision, and strategic plan, which is publicized through the TPCSC website and public meetings.

**Documents:** Emails to schools notifying them of appeal rights, Strategic plan, Commission meetings and slide decks where strategic plan is publicly discussed